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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD O'BRINGER, individually,

Plaintiff,

vs.

PROGRESSIVE CASUALTY INSURANCE
COMPANY dba PROGRESSIVE; DOES I through
X, inclusive; and ROE BUSINESS ENTITIES I
through X, inclusive; jointly and severally,

Defendants.

Case No: 2:23-cv-00100-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(First Request)**

Defendant PROGRESSIVE CASUALTY INSURANCE COMPANY, and Plaintiff

RICHARD O'BRINGER, through their respective counsel submit the foregoing stipulation and
order to extend discovery deadlines pursuant to LR 26-4 as follows:

1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	02/21/2023
Defendant's Initial Rule 26(a) Disclosures	03/03/2023
Plaintiff's First Supplemental Rule 26(a) Disclosures	03/09/2023
Defendant's First Set of Requests for Admission, Requests for Production and Interrogatories to Plaintiff	04/03/2023
Plaintiff's Answers to Defendant's First Set of Requests for Admission	04/26/2023
Plaintiff's Responses to Defendant's First Set of Requests for Production	04/27/2023
Plaintiff's Answers to Defendant's First Set of	05/01/2023

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Item	Date Completed
Interrogatories	
Plaintiff's Second Supplemental Rule 26(a) Disclosures	04/10/2023
Plaintiff's Third Supplemental Rule 26(a) Disclosures	06/02/2023
Plaintiff's Fourth Supplemental Rule 26(a) Disclosures	07/24/2023
Deposition of Plaintiff Richard O'Bringer	09/29/2023
Defendant's First Supplemental Rule 26(a) Disclosures	11/17/2023
Plaintiff's Fifth Supplemental Rule 26(a) Disclosures	11/22/2023

2. Discovery Remaining

The following discovery remains to be completed:

- a) Additional written Discovery;
- b) Deposition of Debi Bruns-Lake, claims adjuster for Defendant;
- c) Deposition of Person(s) Most Knowledgeable for Defendant;
- d) Deposition(s) of percipient witnesses;
- e) Deposition(s) of treating physicians;
- f) Disclosure of expert witnesses; and
- g) Deposition(s) all expert witnesses.

3. Reason Why Discovery Was Not Completed

Discovery in this matter is currently scheduled to close on April 10, 2024 with initial expert disclosures currently due by February 12, 2024. Although discovery has diligently progressed since the Scheduling Order was filed on March 3, 2023, discovery has been delayed due to counsel for Defendants having recently been preparing for trial and the upcoming holidays. Additionally, Plaintiff has recently filed an Amended Complaint in which new allegations are made. Due to limitations with Counsel's schedule, additional time is needed to conduct depositions and additional discovery prior to retaining and disclosing expert witnesses. As such, the parties believe that good cause exists to justify extending the discovery deadlines and hereby request a 60 day extension of the discovery deadlines to allow for additional time to complete the remaining discovery.

4. ~~Proposed~~ Schedule for Completing Discovery

Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Amend pleadings or add parties	January 11, 2024	March 11, 2024
Expert Designations	February 12, 2024	April 12, 2024
Rebuttal Expert Designations	March 13, 2024	May 13, 2024
Discovery Cut-off	April 10, 2024	June 10, 2024
Dispositive Motions	May 10, 2024	July 9, 2024
Joint Pre-Trial Order	June 7, 2024	August 6, 2024

Counsel further state that the requested extension of discovery deadlines is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED: January 8th, 2024

RICHARD HARRIS LAW FIRM

By: /s/ Clark Seegmiller
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DATED: January 5th, 2024

BARRON & PRUITT, LLP

By: /s/ William H. Pruitt
 WILLIAM H. PRUITT, ESQ.
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IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE

DATED: January 8, 2024

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